

EXHIBIT 23

RANDI J. HARTMAN
Amro Ali vs Westchester Medical Center

October 21, 2020

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1
2 UNITED STATES DISTRICT COURT
3 SOUTHERN DISTRICT OF NEW YORK

4 AMRO ALI, M.D.,

5 PLAINTIFF,

6 -against-

Case No.: 19-CV-08324
(DLC) (DCF)

7 WESTCHESTER MEDICAL CENTER and NEW YORK
8 MEDICAL COLLEGE,

9 DEFENDANTS.

10
11 DATE: October 21, 2020

12 TIME: 12:30 P.M.

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14
15 REMOTE DEPOSITION of RANDI JOY
16 HARTMAN, taken by the Plaintiff, pursuant to
17 a Notice and to the Federal Rules of Civil
18 Procedure, held via video teleconference,
19 before Diane Buchanan, a Notary Public of the
20 State of New York.
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A P P E A R A N C E S:

ROBERT W. SADOWSKI PLLC
Attorneys for the Plaintiff
800 Third Avenue
New York, New York 10022
BY: ROBERT SADOWSKI, ESQ.

MEYER SUOZZI ENGLISH & KLEIN, P.C.
Attorneys for the Defendants
1350 Broadway
New York, New York 10018
BY: PAUL MILLUS, ESQ.

ALSO PRESENT: Amro Ali
Emily Bernstein

* * *

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F E D E R A L S T I P U L A T I O N S

IT IS HEREBY STIPULATED AND AGREED by and between the counsel for the respective parties herein that the sealing, filing and certification of the within deposition be waived; that the original of the deposition may be signed and sworn to by the witness before anyone authorized to administer an oath, with the same effect as if signed before a Judge of the Court; that an unsigned copy of the deposition may be used with the same force and effect as if signed by the witness, 30 days after service of the original & 1 copy of same upon counsel for the witness.

IT IS FURTHER STIPULATED AND AGREED that all objections except as to form, are reserved to the time of trial.

* * * *

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RANDI JOY HARTMAN

R A N D I J O Y H A R T M A N , called as
a witness, having been first duly sworn by a
Notary Public of the State of New York, was
examined and testified as follows:

EXAMINATION BY

MR. SADOWSKI:

Q. Please state your name for the
record.

A. Randi Joy Hartman.

Q. What is your address?

A. 51 White Oak Street, Apartment 1-D,
New Rochelle, New York 10801.

Q. Good afternoon, Ms. Hartman, my
name is Robert Sadowski. I represent Dr.
Amro Ali in a lawsuit against Westchester
Medical Center and New York Medical College.
Have you ever been deposed before?

A. No.

Q. So some ground rules. It's very
important that you wait until I finish my
question before you begin to answer because
the court reporter can only take down one of
us speaking at a time. If you want a break
at any time, let us know, I ask if there's a

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2 question pending you answer the question
3 before we break. If you don't understand my
4 question or want me to rephrase it, just let
5 me know. From time to time counsel may
6 object to my question, but you can answer the
7 question despite the objection. Do you
8 understand the instructions I've given you?

9 A. Yes.

10 Q. What, if anything, did you do to
11 prepare for todays deposition?

12 A. I spoke to our office management
13 department that advised me since it is not a
14 Metropolitan issue, does not involve a
15 Metropolitan employee or patient that they
16 suggested that I contact Westchester County
17 Med, which I did, I spoke to the risk
18 management department which put me in touch
19 with the legal department which but me in
20 touch with Mr. Millus.

21 Q. Other than Mr. Millus did you talk
22 to anyone before this deposition today?

23 A. I spoke to Dr. Wandel about it
24 originally. And he had said he already had
25 been predisposed, but he did not give me any

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2 information. And he said I would need to
3 provide deposition.

4 Q. Okay. Did Dr. Wandel contact you
5 or did you contact him?

6 A. I contacted him.

7 Q. And why did you contact him?

8 A. I was asked by Dr. Wong to contact
9 Dr. Wandel to get some information, but I was
10 not able to get any information from Dr.
11 Wandel about the case.

12 Q. Prior to right now did you discuss
13 your testimony with anyone else such as Dr.
14 Wong?

15 A. We had a conversation with Mr.
16 Millus and Dr. Wong and myself regarding the
17 case last week or the week before.

18 Q. Okay. And did you talk to Dr. Wong
19 separately?

20 A. No, I did not.

21 Q. You did not have a conversation
22 with him a few minutes ago?

23 A. Yes, I did, but that was under
24 because I thought the computer was not on as
25 of now and he just told me that you had

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2 needed me in ten minutes.

3 Q. Okay. How long have you and Dr.
4 Wong worked together?

5 A. 28 years.

6 Q. And what is your position with him?

7 A. I'm his secretary and
8 administrative assistant.

9 Q. And do you also hold the title of
10 program coordinator at Metropolitan?

11 A. Yes, I do.

12 Q. What program are you the
13 coordinator of?

14 A. The residency program here at
15 Metropolitan. If any of the residents that
16 are currently rotated here, if they have
17 issues I help them to resolve it and if I
18 can't I reach out to my counterpart at
19 Westchester County Medicine.

20 Q. Who is your counterpart at
21 Westchester County?

22 A. Originally Ms. Valtudi and now Ms.
23 Donna Hemmings.

24 Q. Your phone number at Metropolitan
25 is it (212) 423-6080?

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2 A. That is one of the numbers in my
3 office.

4 Q. Okay. What is your understanding
5 who is in charge of the residency program at
6 New York Medical College?

7 A. Right now it was Dr. Wandel and
8 prior to Dr. Wandel it was Dr. Zeitman.
9 And also Dr. Kelly Hutchinson.

10 Q. Okay. What is the process for a
11 new resident coming into the program at
12 Metropolitan?

13 A. We are advised by Westchester
14 Department of Ophthalmology the names of the
15 new residents, the ones that are under
16 contract with Metropolitan. They are given
17 their information, given to our graduate
18 medical education department for getting them
19 on boarding.

20 Q. Okay. And are they given medical
21 examinations?

22 A. Yes.

23 Q. What other sorts of orientation do
24 new residents undertake?

25 A. They have orientation with the

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2 hospital regarding the money aspect and
3 payroll, their benefits, their stuff to do.
4 They are given computer training. They are
5 also given employees help and then they are
6 orientated to the department about the
7 workings of the department, how things are
8 done in the department.

9 Q. Okay. And do they do things like
10 shadow existing residents?

11 A. At the very beginning they shadow
12 the senior residents to get familiar with our
13 protocols and our procedures.

14 Q. Okay. Thank you. Do all residents
15 in connection with the Westchester Medical
16 Center residency program do any rotation
17 through Metropolitan?

18 A. Yes.

19 Q. Do any doctors who are not entering
20 the residency program go through the
21 procedures of medical exam and orientation
22 and shadowing senior residents?

23 A. No, the only other people that
24 shadow the residents are medical students
25 from New York Medical College. And I don't

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2 know what the procedure that they have to do
3 in order to come in. I'm informed that they
4 are going to be here rotating through
5 electives and that's as far as I know.

6 Q. Okay. I'm going to share a
7 document with you. Ms. Hartman, I'm showing
8 you an e-mail chain which starts from Dr. Ali
9 to Dr. Sharma. By the way, do you know Dr.
10 Sharma?

11 A. I just know that he work in
12 Westchester. I never had any dealings with
13 him.

14 Q. I see. The next e-mail up is from
15 Tad Wandel to Dr. Ali and it reads: Great,
16 arrange with Randi the program coordinator at
17 Met to accelerate your entry. Her phone
18 number is (212) 423-6080. The Randi being
19 referred to in this e-mail, that's you, isn't
20 it?

21 A. I believe so.

22 Q. And when Dr. Wandel says arrange
23 with Randi the program coordinator at Met to
24 accelerate your entry, did Dr. Ali contact
25 you?

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2 A. I spoke to him, but at this point I
3 do not remember our conversation from 2017.

4 Q. I see. Did there come a time when
5 you did some work with Dr. Ali as program
6 coordinator at Metropolitan?

7 A. All I do remember regarding is that
8 he was told to contact Dr. Wandel and that I
9 was notified that he was going to come down
10 strictly to shadow.

11 Q. And did he take a medical
12 examination?

13 A. I do not remember right now. I
14 would have to check with our employees health
15 department to see if that happened.

16 Q. Okay. Do you know when Dr. Wandel,
17 the residency program had at New York Medical
18 College told Dr. Ali to contact you to
19 accelerate your entry, do you know what he
20 meant by that?

21 A. No, I do not.

22 Q. Okay. Would that mean accelerate
23 his entry into the residency program?

24 A. I can't speak for Dr. Wandel
25 because, like I said, the only thing I do

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2 remember is that I was told that he was
3 coming down to strictly shadow and that was
4 over three years ago. So, I don't know what
5 I did with Dr. Ali on that time.

6 Q. Do you know how long Dr. Ali spent
7 at Metropolitan?

8 A. I believe it was a week, possibly
9 two, but I'm not 100 percent sure.

10 Q. Do you know why he left after a
11 week or two?

12 A. I was under the impression that he
13 went back up to Westchester.

14 Q. Okay. And do you know why he went
15 back up to Westchester?

16 A. No, I do not.

17 Q. Okay.

18 MR. SADOWSKI: I have no more
19 questions of this witness.

20 MR. MILLUS: I have none.

21 MR. SADOWSKI: All right. We are
22 concluded.

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(Time noted: 12:50 p.m.)

RANDI JOY HARTMAN

Subscribed and sworn to before me
this ____ day of _____, 2020.

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RANDI JOY HARTMAN

C E R T I F I C A T E

STATE OF NEW YORK)

: ss.

COUNTY OF KINGS)

I, DIANE BUCHANAN, a Notary Public
within and for the State of New York, do
hereby certify:

That RANDI JOY HARTMAN, the witness
whose deposition is hereinbefore set
forth, was duly sworn by me and that
such deposition is a true record of the
testimony given by the witness.

I further certify that I am not
related to any of the parties to this
action by blood or marriage, and that I
am in no way interested in the outcome
of this matter.

IN WITNESS WHEREOF, I have hereunto
set my hand this 5th day of November,
2020.

Diane Buchanan

DIANE BUCHANAN

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----- I N D E X -----

| WITNESS | EXAMINATION BY | PAGE |
|-------------------|----------------|------|
| RANDI JOY HARTMAN | MR. SADOWSKI | 4 |

----- INFORMATION REQUESTS -----

DIRECTIONS: None

RULINGS: None

TO BE FURNISHED: None

REQUESTS: None

MOTIONS: None

----- EXHIBITS -----

(None)

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DEPOSITION ERRATA SHEET

Our Assignment No.: J6115997

Case Caption: Amro Ali vs. Westchester
Medical Center

DECLARATION UNDER PENALTY OF PERJURY

I declare under penalty of perjury
that I have read the entire transcript of my
Deposition taken in the captioned matter or
the same has been read to me, and the same is
true and accurate, save and except for
changes and/or corrections, if any, as
indicated by me on the DEPOSITION ERRATA
SHEET hereof, with the understanding that I
offer these changes as if still under oath.

Randi Joy Hartman

Subscribed and sworn to on the ____ day of
_____, 20 ____ before me.

Notary Public,
in and for the State of

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DEPOSITION ERRATA SHEET

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Randi Joy Hartman